

1 John W. Sigler  
2 13129 Stern Ave  
3 La Mirada, California 90638  
4 Telephone: (714) 697-8576  
5 Email: JSIGLER@SWS-LLC.COM

***Plaintiff In Propria Persona***

6 **UNITED STATES DISTRICT COURT**  
7 **CENTRAL DISTRICT OF CALIFORNIA**

8  
9 JOHN W. SIGLER,

10 Plaintiff,

11 vs.

12  
13 Jorge Gonzalez, USAA Casualty  
14 Insurance Company, Interinsurance  
15 Exchange of Automobile Club of  
16 Southern California, Imperial Body  
17 Shop, Inc., and DOEs 1 to 99,  
18 inclusive;

19  
20 Defendants.  
21

Case No. 8:22-cv-2325-CJC-JDE

**DECLARATION IN  
SUPPORT OF  
REQUEST FOR  
ENTRY OF DEFAULT**

22 I, John W. Sigler, declare under penalty of perjury that the following facts are  
23 true and correct to the best of my information and belief:

24 1. I am the Plaintiff serving In Propria Persona in this action.

25 2. On March 22, 2023, I had a copy of the original Summons and  
26 Complaint served on Defendant Jorge Gonzalez's attorney at the offices of  
27 Ford, Walker, Haggerty, and Behar located in Long Beach, CA. A copy of the  
28

\_\_\_\_\_  
Plaintiff John W. Sigler:

DECLARATION IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT BY THE CLERK

1 Proof of Service is attached as **Exhibit A**; and was filed with the Superior  
2 Court of California on March 31, 2023, who issued the original Summons.

3 3. An informational copy of the Proof of Service was filed with the  
4 Federal Court on March 31, 2023 as Document 27.

5 4. The Complaint was originally filed with the California Superior court  
6 on November 18, 2022.

7 5. On December 29, 2023, said Complaint was removed to Federal Court  
8 by the Defendants as shown in Document 1 contained in the Federal Court  
9 Records.

10 6. Since I had Mr. Gonzalez served through his attorney on March 22,  
11 2023, it is my position that according to FRCP Rule 12 and Rule 81, Mr.  
12 Gonzalez was required to respond to the complaint by April 13, 2023 or be in  
13 default as of April 14, 2023.

14 7. I was legally allowed to serve Mr. Gonzalez through his attorneys  
15 because on March 17, 2023 at 3:31 pm I received the email contained in  
16 **Exhibit B** from Defendant's attorney Eran Forster; within which Mr. Forster  
17 stated that the law firm of Ford, Walker, Haggerty and Behar were representing  
18 Defendant Jorge Gonzalez and legal documents were to be served on their law  
19 firm, which justified my March 22, 2023 service of the Complaint and  
20 Summons on Mr. Gonzalez's attorneys.

21 8. Prior to receiving the email shown in **Exhibit B**, and due to Mr.  
22 Gonzalez avoiding earlier attempts at personal service, on March 17, 2023 at  
23 10:08am I mailed a Request to Waive Service of Summons to the last known  
24 address of Mr. Gonzalez, five hours before receiving the confirmation email of  
25 **Exhibit B** that Mr. Gonzalez had retained an attorney.

26 9. **Exhibit C** contains a copy of the Request to Waive and the Waiver  
27 mailed to Mr. Gonzalez on March 17, 2023.  
28

1        10. **Exhibit D** contains a photo of all the documents included in the  
2 mailing to Mr. Gonzalez, as well as the USPS label with the tracking number.

3        11. **Exhibit E** contains a copy of the USPS tracking information showing  
4 the package was delivered to Mr. Gonzalez on March 18, 2023.

5        12. Within the Request to Waive Service of Summons, I informed Mr.  
6 Gonzalez that he must return the signed waiver within 30 days of the mailing  
7 date of March 17, 2023; making the deadline of returning the waiver April 17,  
8 2023.

9        13. Mr. Gonzalez and his attorneys failed TO TIMELY RETURN a signed  
10 copy of my Waiver which was sent on March 17, 2023, so no Waiver of  
11 Summons issued by me is in effect or valid.

12        14. On April 24, 2023, I received an email notification from Defendant's  
13 attorney Eran Forster (shown in **Exhibit F**) that Mr. Forster had filed on April  
14 23, 2023 with the Federal Court a Waiver of Service of Summons. A copy of  
15 said Waiver created and filed by Defendant's attorney is included in **Exhibit**  
16 **G**.

17        15. The Waiver of Service of Summons filed by Mr. Forster is a fraudulent  
18 document and is not valid. The document falsely lists the sent date as March  
19 22, 2023, and states that Mr. Forster signed the document on the same date it  
20 was sent. I sent my version of a Waiver to Mr. Gonzalez on March 17, 2023 as  
21 previously proven, and since Mr. Forster resides in Nevada and I live in  
22 California it would be impossible for any Waiver to be sent and signed for on  
23 the same day.

24        16. The fraudulent Waiver filed by Mr. Forster falsely states the "Date  
25 Notice of Lawsuit and Request for Waiver of Service Summons is Sent" was  
26 March 22, 2023. This date has no connection whatsoever with the Request for  
27 Waiver package I mailed to Mr. Gonzalez.  
28

1 17. The date on the original Waiver's sent to Mr. Gonzalez, which Mr.  
2 Gonzalez never signed was March 17, 2023 as shown by **Exhibits C, D, and**  
3 **E.**

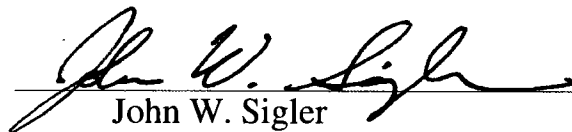
4 18. The only correlations I could find with the date of March 22, 2023 was  
5 that 1) March 22, 2023 was the date that the defendant's attorneys were legally  
6 served the actual Summons and Complaint, so the Waiver's acceptance date  
7 had to on or before March 22, 2023 to claim it was valid, and 2) the Waiver  
8 had to be returned to me within 30 days to be valid, so since the waiver was  
9 filed with the Court on April 23, 2023, claiming the Waiver was signed or sent  
10 any earlier than March 22, 2023 would make it invalid since it was not  
11 returned within 30 days.

12 19. My evaluation of the physical evidence indicates to me that the Wavier  
13 filed with the court as document 30 was filed with the sole intent to defraud me  
14 and the court by claiming a valid Waiver exists when one does not, and  
15 fraudulently claim Mr. Gonzalez is not in default.

16 20. NO VALID WAIVER EXISTS. I had Mr. Gonzalez legally served on  
17 March 22, 2023, and Mr. Gonzalez has been in default since April 14, 2023.

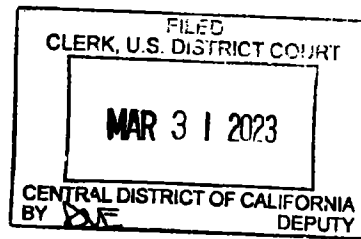
18 Executed on March 26, 2023 at La Mirada, California.

19  
20  
21  
22  
23  
24  
25  
26  
27  
28

  
John W. Sigler  
Plaintiff in Propria Persona

**EXHIBIT A**

Proof of Service of Summons and Complaint on Mr. Gonzalez's attorneys on March 22, 2023.



1 John W. Sigler  
2 13129 Stern Ave  
3 La Mirada, California 90638  
4 Telephone: (714) 697-8576  
5 Email: JSIGLER@SWS-LLC.COM  
6 ***Plaintiff In Propria Persona***

7 **UNITED STATES DISTRICT COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA**

9  
10 **JOHN W. SIGLER,**

11 **Plaintiff,**

12 **vs.**

13  
14 **Jorge Gonzalez, USAA Casualty**  
15 **Insurance Company, Interinsurance**  
16 **Exchange of Automobile Club of**  
17 **Southern California, Imperial Body**  
18 **Shop, Inc., and DOEs 1 to 99,**  
19 **inclusive;**

20  
21 **Defendants.**  
22

**Case No. 8:22-cv-2325-CJC-JDE**

**Filing in Federal System of**  
**Original Superior Court of**  
**California**

**Proof of Service**  
**For Defendant**

**Jorge Gonzalez**

**Judge: Cormac J. Carney**

23 Attached is a copy of the original proof of service for the Summons and Complaint  
24 filed in the Superior Court of California for inclusion in the Federal Court records.  
25  
26  
27  
28

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>John W. Sigler - Plaintiff in Propria Persona</b> <b>13129 Stern Ave.</b> <b>La Mirada, CA 90636</b>  TELEPHONE NO.: 714-697-8576 FAX NO. (Optional): E-MAIL ADDRESS (Optional): JSIGLER@SWS-LLC.COM ATTORNEY FOR (Name): John Sigler, Plaintiff in Propria Persona		FOR COURT USE ONLY  <b>FILED</b> SUPERIOR COURT OF CALIFORNIA COUNTY OF ORANGE CENTRAL JUSTICE CENTER  <b>MAR 24 2023</b>  DAVID H. YAMASAKI, Clerk of the Court  BY: _____ DEPUTY	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS 700 Civic Center Drive MAILING ADDRESS: CITY AND ZIP CODE: Santa Ana, CA 92701 BRANCH NAME Central Justice Center		CASE NUMBER <b>30-2022-01292291</b>	
PLAINTIFF/PETITIONER: John W. Sigler DEFENDANT/RESPONDENT: Gonzalez, USAA, Interinsurance Exchange of Auto Club, et al.		Ref. No. or File No.:	
<b>PROOF OF SERVICE OF SUMMONS</b>			

(Separate proof of service is required for each party served.)

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
  - a. ☒ summons
  - b. ☒ complaint
  - c. ☐ Alternative Dispute Resolution (ADR) package
  - d. ☐ Civil Case Cover Sheet (served in complex cases only)
  - e. ☐ cross-complaint
  - f. ☐ other (specify documents):
3. a. Party served (specify name of party as shown on documents served):  
**Jorge Gonzalez**  
 b. ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):  
**Rocio Baptist - Litigation Secretary at Ford, Walker, Haggerty & Behar, the law firm representing Mr. Gonzalez.**
4. Address where the party was served:  
**One World Trade Center, 27th Floor, Long Beach, CA 90831**
5. I served the party (check proper box)
  - a. ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **March 22, 2023** (2) at (time): **11:10 am**
  - b. ☐ by substituted service. On (date): \_\_\_\_\_ at (time): \_\_\_\_\_ I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3):
    - (1) ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - (2) ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - (3) ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., § 415.20). I mailed the documents on (date): \_\_\_\_\_ from (city): \_\_\_\_\_ or ☐ a declaration of mailing is attached.
    - (5) ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

Page 1 of 2

POS-010

PLAINTIFF/PETITIONER: John W. Sigler DEFENDANT/RESPONDENT: Gonzalez, USAA, Interinsurance Exchange of Auto Club, et al.	CASE NUMBER:
--	--------------

5. c. ☐ **by mail and acknowledgment of receipt of service.** I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid.
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (*Attach completed Notice and Acknowledgment of Receipt.*) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ **by other means** (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☒ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☐ On behalf of (specify):

under the following Code of Civil Procedure section:

- |   |   |
|---|---|
| <input type="checkbox"/> 416.10 (corporation)                     | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                   |
| <input type="checkbox"/> 416.50 (public entity)                   | <input type="checkbox"/> 415.46 (occupant)                            |
|   | <input type="checkbox"/> other:                                       |

7. **Person who served papers**

- a. Name: Anhthu Nguyen
- b. Address: 13129 Stern Ave., La Mirada, CA 90638
- c. Telephone number: 714-697-8520
- d. The fee for service was: \$ \$150.00
- e. I am:

- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ a registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor.
- (ii) Registration No.:
- (iii) County:

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

or

9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date:

Anhthu Nguyen

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

  
(SIGNATURE)

**EXHIBIT B**

Email from Defendant's attorney Eran Forster on March 17, 2023 stating that his law firm was representing Mr. Gonzalez and legal document were to be served on them.

## John Sigler

---

**From:** Eran Forster [eforster@fwhb.com]  
**Sent:** Friday, March 17, 2023 3:31 PM  
**To:** John Sigler; Jeet Sen  
**Cc:** Rocio Baptist  
**Subject:** RE: Sigler v. Gonzalez, et al. - Motion to Compel

Hi John,

We can discuss further Monday or Tuesday afternoon of next week. Otherwise, I have 10:00am on both Thursday and Friday available (23<sup>rd</sup> and 24<sup>th</sup>). Please let me know if you are available. A telephone call is sufficient but we can also do zoom if you prefer. Our position is that we are in full compliance. We are also permitted to have all legal documents go through our firm that are directed towards our client, Mr. Gonzalez.

Ms. Peterson is being disclosed as a potential witness in her capacity as the adjuster for the Interinsurance Exchange of the Automobile Club. All requests to the Interinsurance Exchange of the Automobile Club must go through Ford, Walker, Haggerty & Behar. We are their attorneys of record. Furthermore, Ms. Peterson's personal information is protected is protected under employee privacy laws.

Please let me know when you are available to discuss further so we can resolve any outstanding issues. Thank you.

Eran Forster

*Eran S. Forster, Esq.*

Licensed in California & Nevada

[www.fwhb.com](http://www.fwhb.com)

**From:** John Sigler <jsigler@sws-llc.com>  
**Sent:** Friday, March 17, 2023 2:54 PM  
**To:** Jeet Sen <jsen@fwhb.com>  
**Cc:** Eran Forster <eforster@fwhb.com>; Rocio Baptist <rbaptist@fwhb.com>  
**Subject:** RE: Sigler v. Gonzalez, et al. - Motion to Compel

Dear Mr. Sen,

Please see attached letter regarding your client's failure to comply with Local Rule 26f. I intend to file a motion to compel and you need to meet in my office.

Regards,

John Sigler  
13129 Stern Ave.  
La Mirada, CA 90638  
Cell No. (714) 697-8576

**EXHIBIT C**

Request to Waive Service of Summons and Wavier of the Service of Summons mailed to Mr. Gonzalez on March 17, 2023.

**UNITED STATES DISTRICT COURT**

For the  
Central District of California

Civil Action No. 8:22-cv-2325-CJC-JDE

**To:** Jorge Gonzalez  
427 N. McClay St.  
Santa Ana, CA 92701

**From:** John W. Sigler  
13129 Stern Avre  
La Mirada, CA 90638

**REQUEST TO WAIVE SERVICE OF SUMMONS**

**WHY ARE YOU GETTING THIS?**

A lawsuit has been filed against you in this court under the number shown above. A copy of the complaint is attached: *Note: The origin complaint was filed in California Superior Court, but one of the other Defendants removed the complaint to Federal Court which is why these forms now reference the US. Federal Court.*

This is not a summons, or an official notice from the court. It is a request that, **to avoid expenses**, you waive formal service of a summons by signing and returning the enclosed waiver. **To avoid these expenses**, you must return the signed waiver **within 30 days** from the date shown below, which is the date this notice was sent.

Two copies of the waiver form are enclosed, along with a stamped, self-addressed envelope for returning one copy. If you agree to waive service of the summons, you must sign the enclosed Waiver and return it using the self-addressed stamped Envelope You may keep the extra copy of the Waiver.

**WHAT HAPPENS NEXT?**

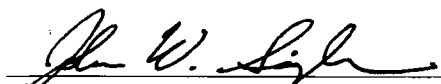
If you return the signed waiver, I will file it with the court. The action will then proceed as if you had been served on the date the waiver is filed, but no summons will be served on you and you will have 60 days from the date this notice is sent (see the date below) to answer the complaint.

**If you do not return the signed Waiver within the time indicated, I will arrange to have the summons and complaint served on you. As stated in the "Duty to Avoid Unnecessary Expense" statement on the bottom section of the Waiver, I will ask the court to require you to pay all expenses of making service.**

Please read the enclosed statement about the duty to avoid unnecessary expenses.

I certify that this request is being sent to you on the date below

Date: March 17, 2023

  
(Signature of the attorney or unrepresented party)

John W. Sigler  
13129 Stern Ave.  
La Mirada, CA 90638  
jsigler@SWS-LLC.com  
714-697-8576

AO 399 (01/09) Waiver of the Service of Summons

# UNITED STATES DISTRICT COURT

for the  
Central District of California

\_\_\_\_\_  
John W. Sigler

\_\_\_\_\_  
Plaintiff

v.

\_\_\_\_\_  
Jorge Gonzalez, et. al.

\_\_\_\_\_  
Defendant

)  
)  
) Civil Action No. 8:22-cv-2325-CJC-JDE  
)  
)

## WAIVER OF THE SERVICE OF SUMMONS

To: Jorge Gonzalez

(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from 03/17/2023, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature of the attorney or unrepresented party

\_\_\_\_\_  
Printed name of party waiving service of summons

\_\_\_\_\_  
Printed name

\_\_\_\_\_  
Address

\_\_\_\_\_  
E-mail address

\_\_\_\_\_  
Telephone number

## Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

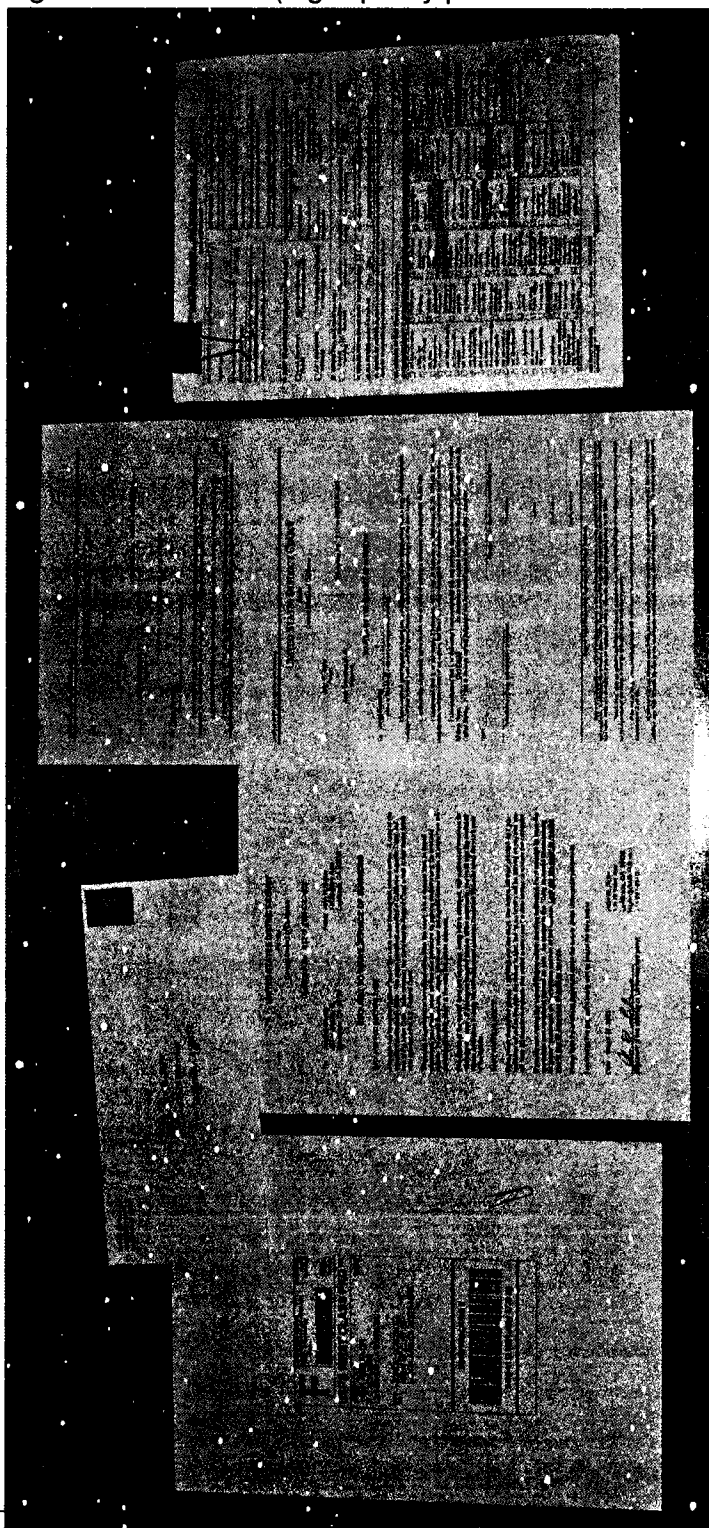
"Good cause" does *not* include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

## **EXHIBIT D**

Photograph of all paperwork mailed to Mr. Gonzalez on March 17, 2023, including the USPS label with tracking number shown. (high quality photo available if required )



Plaintiff John W. Sigler:

DECLARATION IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT BY THE CLERK

**EXHIBIT E**

USPS tracking information for Waiver paperwork mailed to Mr. Gonzalez.



FAQs >

Tracking Number:

Remove X

9400111206214954577509

Copy      Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was delivered in or at the mailbox at 12:42 pm on March 18, 2023 in SANTA ANA, CA 92701.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Feedback

Delivered

Delivered, In/At Mailbox

SANTA ANA, CA 92701  
March 18, 2023, 12:42 pm

Out for Delivery

SANTA ANA, CA 92701  
March 18, 2023, 8:40 am

Arrived at Post Office

SANTA ANA, CA 92711  
March 18, 2023, 8:29 am

Arrived at USPS Facility

SANTA ANA, CA 92711  
March 18, 2023, 5:25 am

Departed USPS Regional Facility

SANTA ANA CA DISTRIBUTION CENTER  
March 18, 2023, 4:21 am

**Arrived at USPS Regional Facility**  
SANTA ANA CA DISTRIBUTION CENTER  
March 18, 2023, 3:46 am

**Departed USPS Regional Facility**  
ANAHEIM CA DISTRIBUTION CENTER  
March 18, 2023, 3:01 am

**Arrived at USPS Regional Facility**  
ANAHEIM CA DISTRIBUTION CENTER  
March 17, 2023, 9:28 pm

**Departed USPS Regional Facility**  
CITY OF INDUSTRY CA DISTRIBUTION CENTER  
March 17, 2023, 8:37 pm

**Arrived at USPS Regional Facility**  
CITY OF INDUSTRY CA DISTRIBUTION CENTER  
March 17, 2023, 4:47 pm

**USPS in possession of item**  
LA MIRADA, CA 90638  
March 17, 2023, 10:08 am

Hide Tracking History

Feedback

Text & Email Updates



USPS Tracking Plus®



Product Information



See Less ^

Track Another Package

Enter tracking or barcode numbers

**EXHIBIT F**

Email received from Defendant's attorney Eran Forster, containing pdf file of fraudulent Waiver submitted to the Court.

## John Sigler

---

**From:** Eran Forster [eforster@fwhb.com]  
**Sent:** Monday, April 24, 2023 12:04 AM  
**To:** John Sigler  
**Cc:** Rocio Eaprist; Angela Wood  
**Subject:** FW: Activity in Case 8:22-cv-02325-CJC-JDE John W. Sigler v. Jorge Gonzalez et al Waiver of Service Executed  
**Attachments:** K\_USDC Forms\_Mai Ver\_WordPerfect\_CV-108.pdf

Mr. Sigler,

I filed a waiver of summons and service for the complaint you served for Mr. Gonzalez to our office. As agreed, we accepted service and I notified the Federal court that service was on 3/22/23. I'll have a response filed shortly. Thanks.

Eran

*Eran S. Forster, Esq.*  
Licensed in California & Nevada

[www.fwhb.com](http://www.fwhb.com)

**From:** cacd\_ecfmail@cacd.uscourts.gov <cacd\_ecfmail@cacd.uscourts.gov>  
**Sent:** Sunday, April 23, 2023 11:57 PM  
**To:** ecfnef@cacd.uscourts.gov  
**Subject:** Activity in Case 8:22-cv-02325-CJC-JDE John W. Sigler v. Jorge Gonzalez et al Waiver of Service Executed

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

## Notice of Electronic Filing

The following transaction was entered by Forster, Eran on 4/23/2023 at 11:56 PM PDT and filed on 4/23/2023

**Case Name:** John W. Sigler v. Jorge Gonzalez et al  
**Case Number:** 8:22-cv-02325-CJC-JDE  
**Filer:** Jorge Gonzalez  
**Document Number:** 30

**Docket Text:**

**WAIVER OF SERVICE Returned Executed filed by Defendant Jorge Gonzalez. Waiver of Service signed by Eran S. Forster. (Forster, Eran)**

**8:22-cv-02325-CJC-JDE Notice has been electronically mailed to:**

Alison J. Shilling [ashilling@maynardcooper.com](mailto:ashilling@maynardcooper.com), [LBorys@maynardcooper.com](mailto:LBorys@maynardcooper.com), [pbronstrup@maynardcooper.com](mailto:pbronstrup@maynardcooper.com)

Aparajito Sen [isen@fwhb.com](mailto:isen@fwhb.com), [rbaptist@fwhb.com](mailto:rbaptist@fwhb.com)

Doris Y Youmara [dyy@manningllp.com](mailto:dyy@manningllp.com)

Eran Scott Forster [eforster@fwhb.com](mailto:eforster@fwhb.com)

Jeffrey M Lenkov [jeffrey.lenkov@manningkass.com](mailto:jeffrey.lenkov@manningkass.com), [jml@manningllp.com](mailto:jml@manningllp.com), [lsf@manningllp.com](mailto:lsf@manningllp.com),  
[tjp@ManningKass.com](mailto:tjp@ManningKass.com)

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**8:22-cv-02325-CJC-JDE Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to :**

John W. Sigler  
13129 Stern Avenue  
La Mirada, CA 90638

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**C:\fakepath\CV-108.pdf

**Electronic document Stamp:**

[STAMP cacdStamp\_ID=1020290914 [Date=4/23/2023] [FileNumber=35721873-0  
] [1634b9dbf02c1e0ac24b4d3e183a90e2bd89ed7a88ccb9da88abfc2f07711c0d47f  
531f3e195de695d75bb5dd229e084dc1fc72870e611750d04e2018de63ef0]]

**EXHIBIT G**

Fraudulent Waiver of Service of Summons filed by Defendant's attorney Eran Forster  
which even contained dates falsified to deceive the Court.

Eran S. Forster, Esq., SBN. 269711

FORD, WALKER, HAGGERTY &amp; BEHAR

One World Trade Center, 27th Floor

Long Beach, California 90831-2700

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

John W. Sigler

PLAINTIFF(S)

JORGE GONZALEZ; USAA CASUALTY INSURANCE  
COMPANY; INTERINSURANCE EXCHANGE OF THE  
AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA;  
IMPERIAL BODY SHOP, INC.; and DOES 1 to 99, inclusive,  
DEFENDANT(S).

CASE NUMBER

8:22-cv-2325-CJC-JDE

WAIVER OF SERVICE OF  
SUMMONS

To: JOHN W. SIGLER

(Name of Plaintiff's Attorney or Unrepresented Plaintiff)

I hereby acknowledge receipt of your request that I waive service of a summons in the above-entitled action. I have also received a copy of the complaint in the action, two copies of this waiver form, and a means by which I can return the signed waiver to you without cost to me.

I agree to save the cost of service of a summons and an additional copy of the complaint in this lawsuit by not requiring that I (or the entity on whose behalf I am acting) be served with judicial process in the manner provided by Rule 4 of the Federal Rules of Civil Procedure.

I (or the entity on whose behalf I am acting) will retain all defenses or objections to the lawsuit or to the jurisdiction or venue of the court except for objections based on a defect in the summons or in the service of the summons.

I understand that judgment may be entered against me (or the party on whose behalf I am acting) if an answer or motion under Rule 12 is not served within 60 days after\* March 22, 2023, or within 90 days after that date if the request was sent outside the United States.

\*Date Notice of Lawsuit and Request for Waiver of Service Summons is sent.

March 22, 2023

Date Signed by Receiving Party

Eran S. Forster

Name

One World Trade Center, 27th Floor

Street Address

Long Beach, California 90831-2700

City, State, Zip Code

Signature

(562) 983-2500 | Fax: (562) 983-2555

Telephone Number and Fax Number

Attorney

Relationship to Entity on Whose Behalf I am Acting

JORGE GONZALEZ

Name of Party Waiving Service

## Duty to Avoid Unnecessary Costs of Service of Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain parties to cooperate in saving unnecessary costs of service of the summons and complaint. A defendant located in the United States who, after being notified of an action and asked by a plaintiff located in the United States to waive service of a summons, fails to do so will be required to bear the cost of such service unless good cause be shown for its failure to sign and return the waiver.

It is not good cause for a failure to waive service that a party believes that the complaint is unfounded, or that the action has been brought in an improper place or in a court that lacks jurisdiction over the subject matter of the action or over its person or property. A party who waives service of the summons retains all defenses and objections (except any relating to the summons or to the service of the summons), and may later object to the jurisdiction of the court or to the place where the action has been brought.

A defendant who waives service must within the time specified on the waiver form serve on the plaintiff's attorney (or unrepresented plaintiff) a response to the complaint and must also file a signed copy of the response with the court. If the answer or motion is not served within this time, a default judgment may be taken against that defendant. By waiving service, a defendant is allowed more time to answer than if the summons had been actually served when the request for waiver of summons was received.

**CERTIFICATE OF SERVICE**

**John W. Sigler v. Jorge Gonzalez, USAA Casualty Insurance Company, et al.**

**Case No. 8:22-cv-02325-CJC-JDE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am a citizen of the United States and reside at 13129 Stern Avenue, La Mirada, CA 90638. I am over the age of 18 and not a party to the within actions.

On April 27, 2023, I served the document(s) entitled,

**1. Declaration in Support of Request for Entry of Default**

on the interested parties in this action by placing true copies thereof enclosed in a sealed envelope addressed (see attached Service List) as stated below:

**(BYMAIL):** I deposited such envelope in the mail at La Mirada Post Office, California with postage fully prepaid. I am familiar with the practice of collection and processing correspondence for mailing. Under that practice, it would be placed for mailing, and deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at La Mirada, California, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the United States that the above is true and correct and was executed on April 27, 2023.

  
AnhThu Nguyen

**SERVICE LIST**

**John W. Sigler v. Jorge Gonzalez, USAA Casualty Insurance Company, et al.**  
**Case No. 8:22-cv-02325-CJC-JDE**

Vivian I. Orlando (SBN 213833)  
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Los Angeles, CA 90067  
Attorney for Defendant USAA Casualty Insurance Co.

Aparajito Sen, Esq.,  
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Long Beach, CA 90831-2700  
Attorney for Defendant Interinsurance Exchange of the Automobile Club  
(sued herein as Interinsurance Exchange of the Automobile Club of Southern  
California)

Jeffery Lenkov  
MANNING & KASS  
ELLROD, RAMIREZ, TRESTER LLP  
801 S. Figueroa St, 15<sup>th</sup> Floor  
Los Angeles, CA 90017-3012  
Attorney for Defendant Imperial Body Shop

Jorge Gonzalez -Defendant  
c/o FORD, WALKER, HAGGERTY & BEHAR  
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Attorney for Defendant Jorge Gonzalez